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**VIA ECF**

The Honorable Richard D. Bennett  
United States District Court Judge  
U.S. Courthouse  
101 W. Lombard Street, Chambers 5D  
Baltimore, Maryland 21201

Re: *United States v. Joseph Liberto*, Crim. No. RDB-19-0600

Dear Judge Bennett:

In my letter to the Court dated June 22, 2021 (ECF No. 58) and at the June 25 motion hearing, I indicated that we intended to file on behalf of Mr. Liberto a motion addressing concerns arising from the government's production of multiple versions of the key job files. Upon further consideration, we have concluded that the appropriate time to raise these matters is at trial, when the Court will have the benefit of testimony concerning the files. As a result, we do not intend to file a pretrial motion concerning these job files. Of course, we reserve all of Mr. Liberto's rights concerning the job files, including his right to oppose their admissibility.

Respectfully,

Martin S. Himeles, Jr.

cc: Counsel of record (via ECF)